

# **EXHIBIT PP**

1 Scott R. Mosko (State Bar No. 106070)  
2 FINNEGAN, HENDERSON, FARABOW,  
3 GARRETT & DUNNER, L.L.P.  
4 Stanford Research Park  
5 700 Hansen Way  
6 Palo Alto, California 94304  
7 Telephone: (650) 849-6600  
8 Facsimile: (650) 849-6666

9  
10 Attorneys for Defendants  
11 Connectu LLC, Cameron Winklevoss,  
12 Tyler Winklevoss, Howard Winklevoss,  
13 and Divya Narendra

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,  
TYLER WINKLEVOSS, HOWARD  
WINKLEVOSS, DIVYA NARENDRA, AND  
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**RESPONSE OF DEFENDANT TYLER  
WINKLEVOSS TO FORM  
INTERROGATORIES**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.  
2 **RESPONDING PARTY:** Defendant TYLER WINKLEVOSS  
3 **SET NO.:** ONE (1)

4 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

5 The above-named party hereby responds, pursuant to California Code of Civil Procedure  
6 Section 2030, to the form interrogatories as follows:

7 **PREFATORY STATEMENT**

8 It should be noted that this responding party has not fully completed its investigation of the  
9 facts relating to this case, has not completed discovery, and has not completed its preparation for  
10 trial.

11 All of the responses contained herein are based only upon such information and documents  
12 as are presently available to and specifically known to this responding party and disclose only those  
13 contentions which presently occur to such responding party.

14 It is anticipated that further discovery, independent investigation, legal research, and analysis  
15 will supply additional facts and add meaning to known facts, as well as establish entirely new factual  
16 conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and  
17 variations from the contentions herein set forth.

18 The following responses are given without prejudice to responding party's right to produce  
19 evidence of any subsequently discovery fact or facts which this responding party may later recall.  
20 Responding party accordingly reserves the right to change any and all answers herein as additional  
21 facts are ascertained, analyses are made, legal research is completed, and contentions are made. The  
22 responses contained herein are made in a good faith effort to supply as much factual information and  
23 as much specification of legal contentions as are presently known, but should in no way be to the  
24 prejudice of this responding party in relation to further discovery, research, or analysis.

25 **RESPONSE TO FORM INTERROGATORIES**

26 **Response to 1.1**

27 I was the only person who prepared the responses to these interrogatories.  
28

1 **Response to 2.1**

2 Tyler Winklevoss

3 **Response to 2.2**

4 Southampton, NY

5 **Response to 2.3**

6 Not applicable as there was no "unauthorized access of the Facebook's data."

7 **Response to 2.4**

8 Not applicable as there was no "unauthorized access of the Facebook's data."

9 **Response to 2.5**

10 (a) 100 Landsdowne Street, Apt. 1405  
11 Cambridge, MA 02139

12 and/or

13 10 Khakum Wood Road  
14 Greenwich, CT 06831

15 (b) and (c)

16 In or about 2003 through in or about 2005: 8 Museum Way, Apt. 2406  
17 Cambridge, MA 02141  
18 2002 - 2004

19 or

20 Pforzheimer House  
21 56 Linnean Street  
22 Cambridge, MA 02141

23 or

24 10 Khakum Wood Road  
25 Greenwich, CT 06831

26 In or about 2001 through in or about 2003: Pforzheimer House  
27 56 Linnean Street  
28 Cambridge, MA 02138

29 **Response to 2.6**

30 Not applicable as there was no "unauthorized access of the Facebook's data."

1 **Response to 2.7**

2 1996-2000: High School Diploma Brunswick School 100 Maher Avenue Greenwich, CT.  
3 2000-2004: B.A. Economics Harvard University Cambridge, MA 02138

4 **Response to 2.8**

5 No

6 **Response to 2.11**

7 Not applicable as there was no "unauthorized access of the Facebook's data."

8 **Response to 2.12**

9 Not applicable as there was no "unauthorized access of the Facebook's data."

10 **Response to 3.1**

11 No

12 **Response to 3.2**

13 No

14 **Response to 3.3**

15 No

16 **Response to 3.4**

17 No

18 **Response to 3.5**

19 No

20 **Response to 3.6**

21 No

22 **Response to 3.7**

23 No

24 **Response to 4.1**

25 Not applicable as there was no "unauthorized access of the Facebook's data."

26 **Response to 4.2**

27 Not applicable as there was no "unauthorized access of the Facebook's data."

1 **Response to 8.2**

2 Not applicable as there was no "unauthorized access of the Facebook's data."

3 **Response to 8.3**

4 Not applicable as there was no "unauthorized access of the Facebook's data."

5 **Response to 8.4**

6 Not applicable as there was no "unauthorized access of the Facebook's data."

7 **Response to 11.1**

8 Not applicable as there was no "unauthorized access of the Facebook's data."

9 **Response to 12.1**

10 Not applicable as there was no "unauthorized access of the Facebook's data."

11 **Response to 12.2**

12 Not applicable as there was no "unauthorized access of the Facebook's data."

13 **Response to 12.3**

14 Not applicable as there was no "unauthorized access of the Facebook's data."

15 **Response to 12.4**

16 Not applicable as there was no "unauthorized access of the Facebook's data."

17 **Response to 12.5**

18 Not applicable as there was no "unauthorized access of the Facebook's data."

19 **Response to 12.6**

20 Not applicable as there was no "unauthorized access of the Facebook's data."

21 **Response to 12.7**

22 Not applicable as there was no "unauthorized access of the Facebook's data."

23 **Response to 13.1**

24 Not applicable as there was no "unauthorized access of the Facebook's data."

25 **Response to 13.2**

26 Not applicable as there was no "unauthorized access of the Facebook's data."

27 **Response to 15.1**

28 No applicable. A demurrer and a motion to quash was filed.

1 **Response to 16.1**

2 Not applicable as there was no "unauthorized access of the Facebook's data." See  
3 ConnectU's demurrer, filed on October 25, 2005.

4 **Response to 16.2**

5 Not applicable as there was no "unauthorized access of the Facebook's data." See  
6 ConnectU's demurrer, filed on October 25, 2005.

7 **Response to 16.3**

8 Not applicable as there was no "unauthorized access of the Facebook's data."

9 **Response to 16.6**

10 Not applicable as there was no "unauthorized access of the Facebook's data."

11 **Response to 16.7**

12 Not applicable as there was no "unauthorized access of the Facebook's data."

13 **Response to 16.8**

14 Responding party does not understand Plaintiff is claiming property damage.

15 **Response to 16.9**

16 Not applicable as there was no "unauthorized access of the Facebook's data."

17 **Response to 17.1**

18 Regarding Request No. 1, Responding Party states he does not have a FACEBOOK  
19 individual member ID.

20 Regarding Request No. 2, Responding Party visited FACEBOOK's website only in his  
21 capacity as a member of ConnectU. See ConnectU's Response to Request No. 2 and its Response to  
22 Interrogatory No. 17.1 as it concerns Request For Admissions, No. 2.

23 Regarding Request No. 3, Responding Party visited FACEBOOK's website only in his  
24 capacity as a member of ConnectU. See ConnectU's Response to Request No. 3 and its Response to  
25 Interrogatory No. 17.1 as it concerns Request For Admissions, No. 3.

26 Regarding Request No. 4, Responding Party visited FACEBOOK's website only in his  
27 capacity as a member of ConnectU. See ConnectU's Response to Request No. 4.

28 Regarding Request No. 5, Responding Party visited FACEBOOK's website only in his  
capacity as a member of ConnectU. See ConnectU's Response to Request No. 5.

Regarding Request No. 6, Responding Party visited FACEBOOK's website only in his  
capacity as a member of ConnectU. See ConnectU's Response to Request No. 6 and its Response to  
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 6.

Regarding Request No. 7, Responding Party visited FACEBOOK's website only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 7.

Regarding Request No. 8, Responding Party activities regarding FACEBOOK's website were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 8 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 8.

Regarding Request No. 9, Responding Party activities regarding FACEBOOK's website were done only in his capacity as a member of ConnectU.. See ConnectU's Response to Request No. 9 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 9.

Regarding Request No. 10, Responding Party activities regarding FACEBOOK's website were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 10 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 10.

Regarding Request No. 11, Responding Party activities regarding FACEBOOK's website were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 11 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 11.

Regarding Request No. 12, Responding Party activities regarding FACEBOOK's website were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 12 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 12.

Regarding Request No. 13, Responding Party activities regarding FACEBOOK's website were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 13 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 13.

Regarding Request No. 14, Responding Party activities regarding FACEBOOK's website were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 14 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 14.

Regarding Request No. 15, Responding Party visited FACEBOOK's website only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 15 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 15.

Regarding Request No. 16, Responding Party visited FACEBOOK's website only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 16.

Regarding Request No. 17, Responding Party visited FACEBOOK's website only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 17 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 17.

Regarding Request No. 18, Responding Party visited FACEBOOK's website only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 18 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 18.

Regarding Request No. 19, Responding Party visited FACEBOOK's website only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 19 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 19.

Regarding Request No. 20, Responding Party visited FACEBOOK's website only in his capacity as a member of ConnectU. See ConnectU's Response to Request No. 20 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 20.



1 Regarding Request No. 21, Responding Party visited FACEBOOK's website only in his  
2 capacity as a member of ConnectU. See ConnectU's Response to Request No. 21 and its Response  
to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 21.

3 Regarding Request No. 22, Responding Party activities regarding FACEBOOK's website  
4 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
22.

5 Regarding Request No. 23, Responding Party activities regarding FACEBOOK's website  
6 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
23 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 23.

7 Regarding Request No. 24, Responding Party activities regarding FACEBOOK's website  
8 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
24 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 24.

9 Regarding Request No. 25, Responding Party activities regarding FACEBOOK's website  
10 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.  
25 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 25.

11  
12 **Response to 50.3**

13 Responding party does not understand that there is an agreement alleged in the Plaintiff's  
14 complaint.

15 **Response to 50.4**

16 Responding party does not understand that there is an agreement alleged in the Plaintiff's  
complaint.

17 **Response to 50.5**

18 Responding party does not understand that there is an agreement alleged in the Plaintiff's  
19 complaint.

20 **Response to 50.6**

21 Responding party does not understand that there is an agreement alleged in the Plaintiff's  
complaint.

22 //

1  
2 TYLER WINKLEVOSS, under penalty of perjury under the laws of the State of California,  
3 states as follows:

- 4 1. That he is one of the Defendants in the above-entitled action;  
5 2. That he has read the foregoing RESPONSE OF TYLER WINKLEVOSS TO FORM  
6 INTERROGATORIES and knows the contents thereof, and that the same is true of his own  
7 knowledge, save and except as to the matters which are therein stated on his information or belief,  
8 and as to those matters, he believes it to be true.

9 Executed on the 30 day of October, 2005, at 7:25 PM.

10   
11 Tyler Winklevoss